



November 19, 2018

**Via Electronic Submission**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW, Room TW-A325  
Washington, DC 20554

**Re: Bridging the Digital Divide for Low-Income Consumers, WC Docket No. 17-287  
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42  
Telecommunications Carriers Eligible for Universal Service Support, WC  
Docket No. 09-197**

Dear Ms. Dortch:

On November 19, 2018, Charles McKee and I of Sprint met with Trent Harkrader, Michelle Schaefer, Jessica Campbell, Rashann Duvall, Allison Jones, and Nathan Eagan of the Wireline Competition Bureau regarding the Lifeline reform proposals pending before the Commission in the above-captioned proceedings.

Sprint focused on three issues. First, we explained that the Commission should not equate size with riskiness in considering whether to adopt a risk-based approach to auditing, and urged the Commission to reasonably limit the number of audits a service provider must undergo in a given time period, assuming no finding of systemic error. Second, we discussed ways to facilitate the smooth deployment of the National Verifier, including having APIs and automated access to eligibility databases. Third, should the Commission move forward with a proposal to construct a service provider agent registry, we urged the Commission to work with the industry on its development and deployment.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 433-4503.

Sincerely,

*/s/ Norina T. Moy*

Norina T. Moy  
Director, Government Affairs

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c: Trent Harkrader  
Jessica Campbell  
Rashann Duvall  
Allison Jones  
Nathan Eagan  
Michelle Schaefer